Exemption 5: Deliberative Processs

DRAFT – FOR DELIBERATION ONLY

EPA Region 7 Office of Public Affairs
Desk Statement – SO2 Air Quality Standard Designation – Ameren Missouri-Labadie

[redacted]

Background

On June 2, 2010, the EPA established a primary 1-hour SO2 air quality standard at a level of 75 parts per billion (99th percentile value, averaged over 3 consecutive years). The revised standard will improve public health protection, especially for people with asthma, children and the elderly.

This final rule gives air agencies the flexibility to characterize air quality using either modeling of actual source emissions or using appropriately sited ambient air quality monitors. Modeling and monitoring are both appropriate ways to assess local SO2 concentrations, and this flexibility allows an air agency to select a cost-effective approach that adequately characterizes each required area.

On August 10, 2015, the U.S. Environmental Protection Agency finalized requirements for air agencies to monitor or model ambient sulfur dioxide (SO2) levels in areas with large sources of SO2 emissions to help implement the 1-hour SO2 National Air Ambient Quality Standard (NAAQS).

– Annual Actual emissions in 2015 - 34,432 tons of SO2.

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- This final rule establishes that, at a minimum, air agencies must characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO2. An air agency may avoid the requirement for air quality characterization near a source by adopting enforceable emission limits that ensure that the source will not emit more than 2,000 tpy of SO2.
- Ameren Missouri-Labadie Energy Center – Annual Actual emissions in 2015 were 34,432 tons of SO2. A monitor located (direction) of the Labadie Energy Center has been collecting data for Missouri Department of Natural Resources since April 2015 and the rule requires data averaged over three consecutive years.
- By July 1, 2016, each air agency is required to identify, for each source area on the list, the approach (ambient monitoring or air quality modeling) it will use to characterize air quality. In lieu of characterizing areas around listed 2,000 tpy or larger sources, air agencies may indicate by July 1, 2016 that they will adopt enforceable emissions limitations that will limit those sources' emissions to below 2,000 tpy.

The Clean Air Act requires EPA to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants; sulfur dioxide (SO2) is one of these. EPA works with partners at state, local, and tribal air quality agencies to meet these standards.

Timeline

- On June 2, 2010, the EPA established a primary 1-hour SO2 air quality standard at a level of 75 parts per billion (99th percentile value, averaged over 3 consecutive years). The revised standard will improve public health protection, especially for people with asthma, children and the elderly.
- A March 2015 court order requires the EPA to complete designations for the 2010 SO2 standard for all remaining areas in the country in up to three additional rounds:

By July 2, 2016 –

- areas that have monitored violations of the 2010 SO2 standard based on 2013 – 2015 air quality data; and
- areas that contain any stationary source not announced for retirement that according to EPA's Air Markets Database emitted in 2012 either (a) more than 16,000 tons of SO2 or (b) more than 2,600 tons of SO2 and had an average emission rate of at least 0.45 lbs SO2/mmbtu.

By December 31, 2017 – areas where states have not installed and begun operating a new SO2 monitoring network.

By December 31, 2020 – all remaining areas. For most areas, the data required by this final rule will be available in time to inform the designations made under the Court ordered schedule.